

REMARKS

Claims 1-20 are pending. Claims 1, 2, 4, 7, 8, 10, 13, 18 and 20 are amended. The amendment to claim 20 was solely to provide consistency in the spelling of "sawtooth".

In paragraph 1, on page 2 of the Office Action, claims 2-4, 6, 8-10 and 12-20 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Specific language in claims 2, 4, 8, 10, 13 and 18 was identified as forming the basis for the rejection.

The claims have been amended in response to the rejection. It is respectfully requested that the rejection be withdrawn.

In paragraph 2, on page 3 of the Office Action, claims 1, 2, 4, 7, 8 and 10 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 3,989,238 to McCarthy et al. (McCarthy). The rejection is respectfully traversed.

Applicants' claim 1 calls for a sheet-supply device for supplying sheets from a stack of sheets one at a time in a sheet feed direction, the sheet-supply device comprising a hopper portion that has an inclined wall for holding a stack of sheets in an inclined position and a lower edge receiving portion for receiving lower edges of the sheets; a sheet feed mechanism that includes a sheet-supply roller for supplying a topmost sheet from the stack of sheets loaded on the hopper portion; and a first friction member, that is provided at a position near a lower end of the inclined wall of the hopper portion and corresponding to a position where the sheet-supply roller is provided, slidably movable along the inclined wall between a normal position where the friction member is located during a normal sheet feed operation, and a second position upstream of the normal position in the sheet feed direction, the first friction member moving toward the

second position when a sheet is fed in a direction opposite to the sheet feed direction and the sheet contacts the first friction member.

Claim 7 calls for a printing device having a sheet-supply device for supplying sheets from a stack of sheets one at a time in a sheet feed direction, the sheet-supply device comprising a hopper portion that has an inclined wall for holding a stack of sheets in an inclined position and a lower edge receiving portion for receiving lower edges of the sheets; a sheet feed mechanism that includes a sheet-supply roller for supplying a topmost sheet from the stack of sheets loaded on the hopper portion; and a first friction member, that is provided at a position near a lower end of the inclined wall of the hopper portion and corresponding to a position where the sheet-supply roller is provided, slideably movable along the inclined wall between the normal position where the friction member is located during a normal sheet feed operation, and a second position upstream of the normal position in the sheet feed direction, wherein the first friction member moves toward the second position when a sheet is fed in a direction opposite to the sheet feed direction and the sheet contacts the first friction member. McCarthy discloses no such thing.

McCarthy discloses a photocopy machine having a pair of first friction members (Examiner's Office Action label), or friction bars, 138, 140 to each side of a sheet supply roller (Office Action label), or feed tire, 130 that extends down into the groove defined by the friction bars 138, 140. Thus, the friction bars 138, 140 do not correspond to a position where the sheet-supply roller, or feed tire 130, is provided.

Further, the friction bars 138, 140, once positioned, are immovable unless later manually adjusted by the operator. When the friction bars 138, 140 start to wear due to the fed medium being forced downwardly against their edges by the feed tire 130, the operator can loosen a

thumb screw 146 and reposition the friction bars 138, 140 (col. 6, lines 48-52). The wear results because the feed tire 130 penetrates below the upper surfaces of the friction bars 138, 140 by approximately 1/32 inch and the fed material is forced into a gap or clearance between the feed tire 130 and each of the friction bars 138, 140 that is approximately 1/16 inch (col. 5, lines 30-34). Thus, McCarthy does not show the first friction member moving toward the second position when a sheet is fed in a direction opposite to the sheet feed direction and the sheet contacts a first friction member. In fact, McCarthy does not discuss moving a sheet in a direction opposite to the feed direction because the documents being discussed are those being scanned and, therefore, they are being fed by a scanning window 60. For all of the foregoing reasons, McCarthy clearly does not anticipate the subject matter of claims 1 and 7. For the same reasons, McCarthy does not suggest the subject matter of claims 1 and 7.

Further, because the pad portions, or friction bars, 138, 140 of McCarthy are not movable, there is no discussion of the relative coefficients of friction between the pad portion and a base portion of the friction pad (claims 2 and 8) and there is absolutely no discussion of the slideable distance that is related to a distance that the fed sheet is conveyed which is the subject matter of claims 4 and 10. Therefore, McCarthy does not anticipate the subject matter of claims 2, 4, 8 and 10 for the reasons discussed with respect to claims 1 and 7, from which they depend, but also because their additional features which are not anticipated. Likewise, McCarthy does not suggest the dependent claims for the same reasons.

In paragraph 3, on page 5 of the Office Action, claims 3 and 9 were rejected under 35 U.S.C. §103(a) as being unpatentable over McCarthy. The rejection is respectfully traversed.

As noted above, McCarthy neither anticipates nor suggests the subject matter of claims 1 or 7, thus McCarthy cannot suggest the subject matter of claims 3 or 9. Further, a

rejection that something is simply a matter of design choice is an improper rejection. A *prima facie* case of obviousness must be established and cannot be done by a bald allegation.

Therefore, for both of the foregoing reasons, it is respectfully requested the rejection be withdrawn.

In paragraph 4, on page 5 of the Office Action, claims 5 and 11 were rejected under 35 U.S.C. §103(a) as being unpatentable over McCarthy as applied to claims 1 and 7 above and further in view of U.S. Patent No. 6,546,210 to Nakamura. The rejection is respectfully traversed.

Nakamura is cited for disclosing a second friction member. The Patent Office alleges Figs. 16 and 17 show an extension 45e that applies friction to the paper, is located at the top of the hopper and, thus, could be considered a second friction member. Such totally misconstrues what the extension 45e shown in Figs. 16 and 17 actually supports and does.

The extension 45e, to the main sheet feed tray 43e, together with the main sheet feed tray 43e, supports a cut sheet packaging member 50e. The cut sheet packaging member 50e is attached to the extension sheet feed tray 45e via a latch using hole 58p that is received on a latch 47e. The cut sheet papers are found within the cut sheet packaging member 50e. Thus, the cut sheet papers themselves never touch the extension sheet feed tray 45e. As such, it cannot function as a second friction member. Therefore, it is respectfully requested the rejection be withdrawn. Further, Nakamura does not overcome the deficiencies of McCarthy with respect to claims 1 and 7.

In paragraph 5, on page 6 of the Office Action, claims 13-15 were rejected under 35 U.S.C. §103(a) being unpatentable over U.S. Patent No. 6,502,816 to Inoue et al. (Inoue). The rejection is respectfully traversed.

Applicants' claim 13 calls for a sheet supply device for a printing device, comprising a paper hopper having a bottom surface, an inclined sheet receiving surface, and a pair of adjustable sheet side edge guides; a first friction member slideably received on the inclined sheet receiving surface, the first friction member slideable in an up and down direction relative to the printing device; and a sheet feed mechanism including a sheet feed roller, wherein the first friction member is normally located at a first position opposing the sheet feed roller with the sheets therebetween and is capable of taking a second position upwardly of the first position when a paper sheet is fed in a direction opposite to the sheet feed direction and is contact with the first friction member.

Inoue, on the other hand, discloses an inclined reference surface 5 at the feed end of a sheet feed tray 1. Mounted to the inclined reference surface 5 is a movable separating inclined surface 2. Generally, for thin sheets, the separating inclined surface 2 does not move during feed because there is a small feeding force (col. 6, lines 50-58; Fig. 3). When a thick sheet is fed, which results in a large feeding force, the separating inclined surface 2 moves upwardly in the direction of feed of the sheet (col. 6, line 59 - col. 7, line 10; Fig. 4). Therefore, the movable member in Inoue only moves in the feed direction, not in the opposite direction when in contact with the fed sheet and, for most embodiments, only when a thick sheet is being fed. Further, as can be seen in all the figures of Inoue that show the feed mechanism, the sheet feed roller 7 is well separated from the separating inclined surface 2 and there are no sheets therebetween.

As to Nakamura, discussed above, although it may show a pair of adjustable side edge guides, it is unclear why such would be necessary in Inoue as Inoue is dealing with a sheet feed tray. One would assume that such a tray is built to accommodate a specific type of paper. Even

if it were not and did have sheet guides, Nakamura would not overcome the deficiencies of Inoue with respect to claim 13.

As to claim 15, as pointed out in discussing Nakamura above, the reference does not have a second friction member and therefore there is no suggestion in either of the two references, or their combination, of a second friction member mounted to the inclined sheet receiving surface above the first friction member as found in Applicants' claim 15. Likewise, there is no discussion of any coefficients of friction satisfying the relationship identified in Applicants' claim 14. Thus, it is respectfully requested the rejection be withdrawn.

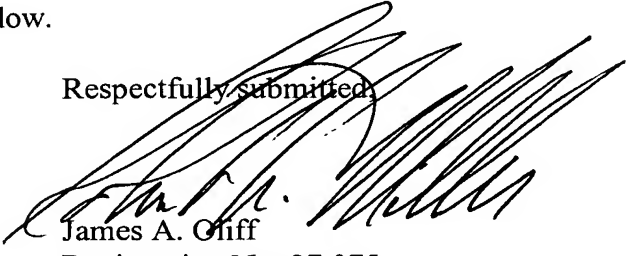
On paragraph 6, on page 7 of the Office Action, claim 16 was rejected under 35 U.S.C. §103(a) being unpatentable over Inoue in view of U.S. Patent No. 5,615,874 to Parthasarathy et al. (Parthasarathy). The rejection is respectfully traversed.

Parthasarathy discloses a sloping rib surface extending in a feed direction, although it is questionable whether one would describe such as a third friction member as defined in Applicants' specification. Obviously anything has some component or coefficient of friction when another object passes across it. However, the ribs themselves are not intended to be a major friction element rather they are intended to create secondary depressions in the stack of sheets that bow upward in an opposite direction from the primary depressions of the stack induced by the pickup rollers and relieved areas (col. 4, lines 11-20). Thus, Parthasarathy not only does not overcome the deficiencies in the rejection of claim 13, Parthasarathy does not, in combination with Inoue, suggest the subject matter of claim 16. It is therefore respectfully requested the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-20 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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